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January 23, 2013

**VIA FIRST CLASS MAIL**

Robert B. Goebel Esq.  
14 Walworth Avenue  
Scarsdale, NY 10583

Re: Jericho Group v. Midtown  
Sam Pfeiffer

Dear Mr. Goebel:

My firm represents Jericho Group and Sam Pfeiffer with respect to their claims pertaining to contract of sale for real property dated June 18, 2002 in the above-referred matter. I am writing as a follow-up to my letter dated January 9, 2013 to request additional documentation that you have as a result of representing Jericho Group and Sam Pfeiffer.

Please provide a copy of any subpoena sent, all responsive documents to said subpoenas, a copy of the deposition transcript, any document requests, any documents received or exchanged and any correspondence to, or from the following people and entities:

1. Shulem Pfeiffer;
2. Maurice Stone, Esq. of Harwood Lloyd, LLC;
3. Joseph Kennedy, Esq. of Harwood Lloyd, LLC;
4. Edward Ross of Chicago (except the deposition transcript);
5. Mr. Wittkoff;
6. NYDEC;
7. Representatives of NYDEC;

8. Meyer Chetrit, the Chetrit Group and its representatives (including but not limited to attorney Mr. Seagel);
9. All exhibits used at the 2006 deposition of Sam Pfeiffer;
10. Transcript of proceedings before Judge Ramos on March 20, 2006;
11. Copies of any and all depositions taken in this case of Midtown, Jericho Group or to Sam Pfeiffer.

For the purpose of this letter documents are any writing, recording in whatever form, including but not limited to letters, emails, facsimile transmissions, recorded sound, film and pictures. Correspondence shall mean any communication that has been recorded either by writing or some other means.

If you ever represented Michael Szegda, Esq. or any corporation or any entity for which Szegda was a principal, shareholder, member or officer, please provide all information, documents and correspondence relating to that case or cases.

Please provide all documents, correspondence and/or agreements provided to Sanford Young, including billing, invoices and copies of payments between Sanford Young and yourself.

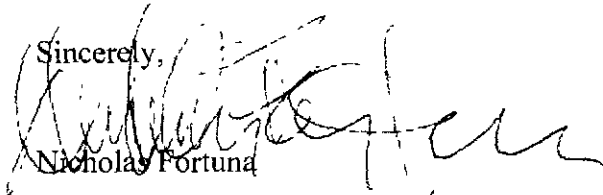
In addition, please provide copies of all of your prior bills, invoices, statements, back-up documentation for all out-of-pocket expenses, documentation regarding all expenses and/or costs to Jericho, and agreements that you have sent to Jericho Group and/or Sam Pfeiffer to the present. Please also send a copy of the Retainer Agreement that you executed with Jericho.

As with the previous letter, please provide copies of all documents showing when and by what method you sent copies of the documents and information requested to Jericho and/or to Sam Pfeiffer.

The client will pay any legitimate outstanding bills as soon as possible. Please send a copy of a detailed bill of outstanding amounts owed. It will not be necessary to put any money in escrow as a result.

Thank You.

Sincerely,



Nicholas Fortuna

Cc: Sam Pfeiffer  
Jericho Group